



July 18, 2005

**VIA FEDERAL EXPRESS DELIVERY SERVICE**  
**TRACKING NUMBER 8511 7574 6531**

**Ms. Darlene Standley, Utilities Division Chief**  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re Data Request Dated June 7, 2005 – Docket No 05-00147

Dear Ms Standley.

Transmitted herein on behalf of Trans National Communications International, Inc ("TNCI"), please find the Company's responses to the above-noted data request. It is important to remember that TNCI takes seriously its obligations to provide timely and accurate responses to Commission inquires and as such, TNCI deeply regrets the delay in providing this information to the Commission and sincerely apologizes for any inconvenience it may have caused

TNCI's Responses

1 The following table depicts the status of the Company's operational authority

State	IXC Authority Granted	CLEC Authority Granted	CLEC Application Submitted/Pending
AK	X	X	
AL	X	X	
AR	X		X
AZ	X	X	
CA	X	X	
CO	X		X
CT	X	X	
DC	X	X	
DE	X		X
FL	X	X	
GA	X	X	
HI	X	X	
IA	X	X	
ID	X	X	
IL	X	X	
IN	X	X	
KS	X		X
KY	X	X	
LA	X		X
MA	X	X	
MD	X	X	

State	INC Authority Granted	CLEC Authority Granted	CLEC Application Submitted/Pending
ME	X	X	
MI	X	X	
MN	X	X	
MO	X	X	
MS	X	X	
MT	X	X	
NC	X		X
ND	X	X	
NE	X		X
NH	X	X	
NJ	X	X	
NM	X		X
NV	X	X	
NY	X	X	
OH	X	X	
OK	X		X
OR	X	X	
PA	X	X	
RI	X	X	
SC	X	X	
SD	X		X
TN	X	X	
TX	X	X	
UT	X	X	
VA	X	X	
VT	X	X	
WA	X	X	
WI	X	X	
WV	X		X
WY	X		X

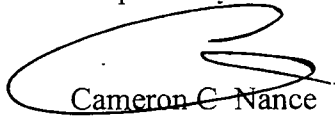
- 2 Please find the request TNCI financial data attached to this correspondence as Exhibit A
- 3 The Company has reviewed the Commission's proceedings related to the provisioning of toll free calling within counties. As such, TNCI affirms its commitment to complying with the authority cited therein, specifically, Tenn. Code Ann § 65-21-114 and TRA Docket No. 03-00502, including means of compliance therein described.
4. Please find TNCI's informational tariff attached to this correspondence as Exhibit B
5. During the period of July 2000 through July 2005, the Company has responded to and resolved fifty-eight (58) complaints from the following submitting jurisdictional authorities eleven (11) FCC concerning billing disputes and unauthorized service conversions. Each complaint has been resolved without a finding of fault against the Company. Please note that a single FCC complaint is still pending resolution as of July 18, 2005, the remaining forty-five (45) complaints primarily concern billing disputes, allegations of unauthorized service conversions, and transfer of account responsibility issues between disputing account-holders. Each complaint has been resolved to the satisfaction of the consumer, the Company and the inquiring authority. At no time has TNCI been fined or had operational authority revoked or diminished in relation to the aforementioned complaints.
- 6 Please find TNCI's complete organizational chart attached to this correspondence as Exhibit C

7. Please note that the following Administrator of the Small and Minority-Owned Business Participation Plan:

Cameron C. Nance, MPA  
Regulatory Affairs Specialist  
Trans National Communications International, Inc.  
2 Charlesgate West  
Boston, Massachusetts 02215  
(617) 369-1163 – Office  
(617) 369-1187 – Fax  
(800) 800-8400 – Toll Free  
[cnance@tnci.com](mailto:cnance@tnci.com) – Email  
<http://www.tnci.com> – Web

TNCI sincerely appreciates your time and attention to this matter. Please direct any questions regarding this filing to the undersigned at (617) 369-1163 or via email at [cnance@tnci.com](mailto:cnance@tnci.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Cameron C. Nance', written over a horizontal line.

Cameron C. Nance  
Regulatory Affairs Department

Attached: Exhibits A - C  
cc File

Exhibit A

TNCI Financial Data

**Trans National Communications  
International, Inc.**

**Financial Statements**

**Years Ended December 31, 2004 and 2003**

Trans National Communications International, Inc  
Financial Statements  
December 31, 2004 and 2003  
Table of Contents

Independent Auditors' Report .....	1
------------------------------------	---

Financial Statements:

Balance Sheets .....	2
Statements of Operations .....	3
Statements of Changes In Shareholders' Equity .....	4
Statements of Cash Flows .....	5
Notes to Financial Statements .....	6-11

*Independent Auditors' Report*

The Board of Directors and Shareholders  
Trans National Communications International, Inc

We have audited the accompanying balance sheets of Trans National Communications International, Inc as of December 31, 2004 and 2003 and the related statements of operations, changes in shareholders' equity and cash flows for the years then ended. The financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the financial statements based on our audits.

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the balance sheet. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Trans National Communications International, Inc as of December 31, 2004 and 2003 and the results of its operations and its cash flows for the years then ended in conformity with accounting principles generally accepted in the United States of America.

*Togian PC*

February 18, 2005  
Cambridge, Massachusetts

Trans National Communications International, Inc  
 Balance Sheets  
 December 31  
 (in thousands)

	2004	2003
<b>Assets</b>		
Current Assets		
Cash And Cash Equivalents	\$977	\$167
Accounts Receivable Net	3,383	3,170
Other Current Assets	367	289
<b>Total Current Assets</b>	<b>4,727</b>	<b>3,626</b>
Fixed Assets, Net	610	594
Due From Affiliated Company	1,205	1,200
Other Assets, Net	937	511
<b>Total Assets</b>	<b>\$7,479</b>	<b>\$5,931</b>
<b>Liabilities And Shareholders' Equity</b>		
Current Liabilities		
Accounts Payable And Accrued Expenses	\$6,747	\$5,632
Current Portion Of Loan Payable	13	35
<b>Total Current Liabilities</b>	<b>6,760</b>	<b>5,667</b>
Loan Payable	0	13
<b>Total Liabilities</b>	<b>6,760</b>	<b>5,680</b>
Shareholders' Equity		
Common Stock \$0.01 Par Value, 10,000 Shares Authorized, 4,473 Issued And Outstanding, and Capital In Excess Of Par	3,235	3,235
Accumulated Deficit	(2,516)	(2,984)
<b>Total Liabilities And Shareholders' Equity</b>	<b>\$7,479</b>	<b>\$5,931</b>

See accompanying notes



Trans National Communications International, Inc  
 Statements of Operations  
 Year Ended December 31  
 (in thousands)

	2004	2003
Revenue	\$41,425	\$43,154
Direct Costs	<u>(31,736)</u>	<u>(35,147)</u>
	9,689	8,007
Selling, General And Administrative Expenses	<u>(7,991)</u>	<u>(6,245)</u>
Income From Operations Before Depreciation And Amortization	1,698	1,762
Depreciation And Amortization	<u>(971)</u>	<u>(1,175)</u>
Income From Operations	727	587
Other Income/(Expenses)		
Incentive Compensation Plans	(125)	0
Interest Expense	(227)	(313)
Interest Income	<u>25</u>	<u>0</u>
Net Income Before Discontinued Operations	400	274
Discontinued Operations	<u>68</u>	<u>(1,594)</u>
Net Income/(Loss)	<u>\$468</u>	<u>(\$1,320)</u>

See accompanying notes

Trans National Communications International, Inc  
 Statements of Changes in Shareholders' Equity  
 Years Ended December 31, 2004 and 2003  
 (in thousands)

	<u>Common Stock</u>		<i>Capital</i>	<i>Accumulated</i>
	<i>Shares</i>	<i>Value</i>	<i>In Excess</i> <i>Of Par</i>	<i>Deficit</i>
Balance At January 1, 2003	4	\$0	\$2,235	(\$1,664)
Capital Contribution			1,000	
Net Loss				(1,320)
Balance At December 31, 2003	4	0	3,235	(2,984)
Net Income				468
Balance At December 31, 2004	4	\$0	\$3,235	(\$2,516)

See accompanying notes

**Trans National Communications International, Inc.**  
**Statements of Cash Flows**  
**Years Ended December 31**  
**(in thousands)**

	<i>2004</i>	<i>2003</i>
<b>Operating Activities</b>		
Net Income/(Loss)	<u>\$468</u>	<u>(\$1 320)</u>
Reconciliation To Cash Flow		
Depreciation And Amortization	971	1 175
Change In		
Accounts Receivable	(213)	1,583
Other Current Assets	(78)	(51)
Accounts Payable And Accrued Expenses	1,115	(558)
Due From Affiliated Company	<u>19</u>	<u>42</u>
Total Adjustments	<u>1 814</u>	<u>2 191</u>
Net Cash Provided By Operating Activities	<u>2,282</u>	<u>871</u>
<b>Cash Flows From Investing Activities</b>		
Purchase Of Fixed Assets	(337)	(253)
Other Assets	<u>(1 076)</u>	<u>(714)</u>
Net Cash Used In Investing Activities	<u>(1 413)</u>	<u>(967)</u>
<b>Cash Flows From Financing Activities</b>		
Proceeds from Capital Contributions	0	1 000
Due From Affiliated Company	(24)	(1,000)
Loan Repayments	<u>(35)</u>	<u>(40)</u>
Net Cash Used In Financing Activities	<u>(59)</u>	<u>(40)</u>
Net Increase/(Decrease) In Cash And Cash Equivalents	810	(136)
Cash And Cash Equivalents, Beginning	<u>167</u>	<u>303</u>
Cash And Cash Equivalents, Ending	<u><u>\$977</u></u>	<u><u>\$167</u></u>

*See accompanying notes*